



**ZACHARY W. CARTER**  
Corporation Counsel

**THE CITY  
OF NEW YORK  
LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**PATRICK BEATH**  
*Special Federal Litigation Division*  
212-356-2656  
Facsimile: (212) 356-3509  
[pbeath@law.nyc.gov](mailto:pbeath@law.nyc.gov)

February 26, 2015

**BY ECF**

Honorable Brian M. Cogan  
United States District Judge, EDNY  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Alice Lopez, as Administrator for William Lopez v. The City of New York, et al.,*  
14 Civ. 03743 (BMC)

Your Honor:

I am an Assistant Corporation Counsel and write on behalf of the parties, in accordance with Your Honor's Order dated November 6, 2014, to set forth a schedule for the completion of fact depositions. Defendants also note that their motion to dismiss the complaint is fully briefed and pending before Your Honor.

The parties have conferred and intend to depose 12 fact witnesses. It is anticipated that these depositions can be completed in ninety days, by no later than May 29, 2015. The undersigned also notes that he will be leaving the Office of the Corporation Counsel at the end of March 2015, and that another attorney will likely appear on the case to represent defendants. The 90-day period to complete fact depositions will allow sufficient time for a new attorney to join the case as the undersigned transitions out.

The parties thank the Court for its time and consideration herein.

Respectfully submitted,

/s/

Patrick Beath  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: Dennis Kelly, Esq., (By ECF)  
Anthony Grandinette, Esq. (By ECF)